

Group Supplier Code of Conduct

Legal & General's purpose is to improve the lives of our customers, build a better society for the long term and create value for our shareholders. In doing so, we seek to build a better future and a more sustainable world.

Our role in the economy goes straight to the heart of our purpose. It manifests in the ways we do business: the investments we make, the ways in which we seek to influence other actors in the economy and how we operate. We invest pensioners' money, insurance premiums and our clients' wealth in useful ways, matching capital with investment opportunities and creating assets with long-term value.

We drive to embed a culture of integrity which is why we take our responsibility as an employer and as a participant in labour markets through our value chain, extremely seriously. We insist on very high standards of business and personal integrity from our people, our suppliers and those doing business with us. This is because we believe that we can only deliver on our ambitions if we have the right foundations for success in place. That includes a commitment to observing the spirit and letter of law and regulation, as well as creating an inclusive environment in which diverse kinds of people can succeed and use their varied experiences to help solve some of the biggest issues facing society.

Our approach to the supply chain

At Legal & General, we have a robust procurement framework to engage with our supply chain effectively and fairly in a manner that manages risk and promotes value in the best interests of our customers, employees, regulators, and shareholders.

As part of that framework, our contracts set out the commercial and legal parameters of our engagements with our suppliers including compliance with laws and regulations and provisions to ensure continuity of services and the security of data.

Our procurement spend spans all categories across the group from services including HR, professional services, group real estate, marketing, and goods such as stationery and corporate items to IT systems and desktop hardware and software.

Our spend generates a positive economic impact in the marketplace and supports the development and growth of other companies within the supply chain. Legal & General aims to build a collaborative supplier ecosystem driven by value-adding partnerships with suppliers that supports innovative solutions.

Purpose of this document

Aimed at our supplier community in the UK, this Code of Conduct is a set of guiding principles underpinning our ambition and direction of travel across several important areas. It is our aim to have all our suppliers agree to the principles in the Code of Conduct and work together with us with intent to drive positive social change.

How we will assess compliance

We will assess your compliance through online questionnaires as part of our onboarding due diligence process, and again at suitable regular intervals in line with our policies. This will include seeking confirmation that you have read and understand this code, and that you will work with us to develop a sustainable supply chain.

Your confirmation and question responses will be evaluated and form part of tender evaluations and contract renewals. We will use aggregated data on responses as part of our annual reporting on key aspects of social impact in our annual reports and would encourage suppliers to do the same, wherever feasible.

Code of conduct focus areas

- Business conduct
- Diversity and inclusion (D&I)
- Human rights & modern slavery
- Environmental sustainability
- Digital accessibility
- Prompt payment
- Real living wage
- Social value

Business conduct

What we do	What we ask of our supply chain
<p>Supplier selection and due diligence – we operate a robust supplier management framework which includes undertaking rigorous due diligence when onboarding new suppliers and through the term of the contracts.</p> <p>We have a whistleblowing policy in place and concerns may be raised by email: whistleblowing@landg.com</p>	<p>Suppliers will:</p> <ul style="list-style-type: none"> • adhere to the Legal & General due diligence process and answer questions honestly, completely and in a timely manner • take reasonable steps to resolve any issues or risks identified in through the process • undertake an appropriate level of due diligence on your own suppliers to ensure continuity of service and security of data • have, or take steps to put in place, a whistleblowing policy.
<p>We operate a Group-wide Financial Crime risk management framework to provide oversight of the management of controls to identify and manage the risk that Legal & General and its customers might be subject to or used to facilitate financial crime.</p> <p>The Group and all wholly or majority owned subsidiaries, are committed to maintaining compliance with all legal and regulatory requirements in relation to financial crimes, which include sanctions, money laundering, financing of terrorism, proliferation of weapons of mass destruction, market abuse, facilitation of tax evasion, bribery & corruption, and fraud.</p> <p>We have policies in place to ensure that Legal & General will:</p> <ul style="list-style-type: none"> • perform appropriate risk-based due diligence, screening and monitoring of all customers, suppliers, and other relevant parties to ensure that financial crime risks can be identified and managed • monitor for and investigate any suspicious activity and fraud and will liaise with law enforcement authorities and/or regulators as appropriate • assure and test the effectiveness of its controls in place to detect and prevent financial crime • training of all Legal & General colleagues and persons acting on our behalf on how to prevent and detect financial crime and the risk management programmes in place at Legal & General. 	<p>Suppliers will ensure appropriate processes and procedures are in place that prevent financial crime risk to Legal & General through the course of the relationship. This includes having appropriate systems and controls to manage risks arising from sanctions, money laundering, financing of terrorism, proliferation of weapons of mass destruction, market abuse, facilitation of tax evasion, bribery & corruption, and fraud.</p> <p>In addition to maintaining effective policies and procedures for the management of financial crime risk, suppliers will:</p> <ul style="list-style-type: none"> • comply with any reasonable requests made by us to provide documents, information, or material to support Legal & General identify and manage any fraud risks and comply with legislative and regulatory requirements • provide any relevant transaction or other records, relevant to the relationship upon reasonable request • ensure any disbursements made through the supply chain are done so legitimately and in accordance with laws of any jurisdiction involved. Ensure no payments are made or flow to sanctioned individuals or facilitate criminal activity in any way • notify Legal & General immediately where it has identified a material risk of breaching financial crime legislation or regulatory requirements, relevant to the relationship • notify Legal & General immediately of any reports to law enforcement or other authorities, as relevant to the relationship.

<p>Our tax strategy, which is published annually on our website, sets out our attitude to our tax affairs and how we conduct ourselves. Paying and collecting the right taxes at the right time is part of our overall approach.</p> <p>We aim to be:</p> <ul style="list-style-type: none"> • sustainable in the long term – our group’s tax rate depends on our business performance and not artificial tax planning • well governed – we manage tax risk like any other risk in our business and invest in our people • fair – we recognise the impact tax has on wider society and undertake to act responsibly in all tax matters • transparent – we seek to explain the taxation of our business to all our stakeholders. 	<p>Suppliers will meet all legal obligations in respect of taxation, in the UK and globally, making all appropriate tax returns and tax payments accurately and on time.</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Diversity and inclusion

What we do	What we ask of our supply chain
<p>Our vision is to build a workplace where we can all perform at our best, no matter who we are. Creating more diverse workforces and more inclusive workplaces is highly important to us: both as an investor and asset manager, and as an employer focussed on the inclusion and wellbeing of all our people.</p> <p>Having a more diverse workforce and a more inclusive workplace is a potential source of commercial advantage for us. It’s also the right thing to do.</p> <p>Our strategy to deliver this focuses on:</p> <ul style="list-style-type: none"> • recruitment and retention, to ensure we have a diverse mix of people in our workforce • leadership and people management capability development, to ensure our people leaders have the practical skills to shape inclusive cultures, and • creation of equitable opportunities for development and progression, available to everyone. <p>We report publicly on our ambitions and several key metrics, including gender and ethnic pay gaps, in our annual Social Impact Report.</p>	<p>Suppliers will protect their employees from discrimination on the grounds of age, disability, gender reassignment, gender identity, marriage and civil partnership, pregnancy, race, religion or belief, sex, or sexual orientation in line with relevant legislation.</p> <p>Suppliers will fulfil all mandatory gender pay gap reporting requirements and we encourage suppliers to make voluntary disclosure of their ethnicity pay gap.</p> <p>We encourage suppliers to have a clear D&I policy for their people, and their own suppliers and to demonstrate the company’s commitment to diversity and inclusion by transparently publishing an evidence-based D&I strategy that includes:</p> <ul style="list-style-type: none"> • the firm’s D&I objectives and goals • the plan to meet these goals • measures used to track progress • ways to ensure adequate knowledge of the D&I strategy amongst staff so that they can engage with it, help improve it, and manage any obstacles. <p>We encourage suppliers to work with diverse businesses and enact inclusive sourcing in their own organisations.</p> <p>Finally, to work with Legal & General to improve awareness of diversity and inclusion issues among staff and wider society.</p>

Note on terminology: some firms have adopted the Diversity, Equity and Inclusion (DEI) term. We use Diversity and Inclusion (D&I) at Legal & General. However, within this we include equitable and fair outcomes for all our people. We are happy to use whichever term our suppliers prefer. For simplicity, we will refer to D&I.

Human rights & modern slavery

What we do	What we ask of our supply chain
<p>We understand our responsibility to prevent, mitigate and remediate the risks of human trafficking, and forced, bonded and child labour where appropriate; and to respect human rights in our operations and our supply chain.</p> <p>Our approach to preventing modern slavery continues to be aligned with the United Nations Guiding Principles on Business and Human Rights. We fully support the principles of the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and we have been a signatory and supporter of the UN Global Compact since 2012.</p> <p>Our commitment to human rights can be found in our human rights policy on our policies page on our corporate website: Our policies - group wide policies Legal & General (legalandgeneral.com)</p> <p>We believe in collaboration and seek to proactively work with our suppliers and supply chain to prevent and mitigate against modern slavery and breaches of human rights in our supply chain. This might include, but is not limited to, agreeing to unannounced visits or audits taking place on sites of suppliers.</p>	<p>We expect suppliers not to participate, facilitate, enable, or benefit directly or indirectly in human rights violations and abuses in their own operations, supply chain, use or design of products/ services, and/or customers.</p> <p>Suppliers will adopt and disclose a commitment to human rights covering their operations and value chains, adhering to applicable voluntary or mandatory human rights frameworks.</p> <p>Suppliers will publish their Modern Slavery Statement if in scope of the Modern Slavery Act 2015 and work with Legal & General to improve awareness of modern slavery and human rights among staff and improve processes to identify breaches of human rights.</p> <p>Suppliers will work with Legal & General to remediate any situation where a breach of modern slavery is suspected.</p>

Environmental sustainability

What we do	What we ask of our supply chain
<p>At Legal & General we recognise that the way in which we operate our businesses has the potential to create both environmental impacts and opportunities.</p> <p>To help ensure that we continue to drive environmental improvements through our operations and to support our long-term approach to managing climate and nature risks, we have a suite of environmental targets and commitments.</p>	<p>Suppliers will share their approach to managing all environmental risks, from regulatory requirements to managing the risks of climate change.</p> <p>Suppliers will provide details of the carbon emissions associated with the products and services provided to Legal & General. We recognise that not all suppliers will have this information readily available and would welcome the opportunity to work with suppliers to help capture and report this important data.</p>

<p>Managing the risks and opportunities from climate change is one of our 6 strategic growth drivers and we have set targets to manage our emissions e.g. 'We will reduce our absolute scope 1 and 2 emissions by 42% by 2030 from a 2021 baseline'.</p> <p>We are committed to protecting the natural resources we use through the implementation of sustainable procurement principles throughout our supply chain and recognise that the purchasing of goods and services is a large contributor to our scope 3 carbon emissions.</p> <p>We want to ensure that we are working with suppliers who share our net zero ambition and are already taking strides to manage their carbon footprint and wider environmental impacts.</p>	<p>We ask that suppliers provide details of environmental targets and in particular, set science-based carbon reduction targets. We define a target as science-based if it is aligned to SBTi criteria i.e., is a mid-term reduction target with enough ambition to align with the global net zero trajectory. We would expect this to be between 40-50% reduction depending on the base year.</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Digital accessibility

What we do	What we ask of our supply chain
<p>We aim to build and test our applications to "AA" conformance standards in the latest WCAG (Web Content Accessibility Guidelines) and update our internal standard when any new success criteria are added to WCAG.</p>	<p>Suppliers will follow the Legal & General Accessibility Guidelines, with all solutions aligned to the latest standards in the WCAG) and all applicable laws and regulations. Suppliers should voluntarily disclose their accessibility compliance, preferably using a VPAT (Voluntary Product Accessibility Template).</p>
<p>We take a people-first approach to inclusive design, ensuring we consider accessibility when defining features – it is not an afterthought.</p>	<p>Suppliers will follow inclusive design approaches, ensuring accessibility is considered when defining features, whether Legal & General includes it as a specific requirement, or not and support users with any specific accessibility training needed to access your software / applications / products.</p>
<p>We promote the use of our open-source design system, Canopy, to maintain high standards of accessibility. We also shift accessibility left wherever possible by adding aria labels and alt text.</p>	<p>Suppliers will consider using our open-source design system, Canopy, to maintain high standards of accessibility, when developing bespoke interfaces for Legal & General.</p>
<p>Accessibility is part of our quality strategy and our Definition of Done, using automated and manual testing for keyboard access/interaction and content.</p>	<p>Suppliers will conduct regular accessibility testing, providing evidence as required. Fix any accessibility issues identified in specified time. If accessible versions cannot be applied or created, this should be communicated and justified proactively.</p>
<p>Our content teams keep our language clear and simple, to make our services understandable to all users. We work with third-party specialists to test our communications, and to monitor our accessibility status through regular third-party tests. We have introduced a "Tell us once" preference centre via The Accessibility Hub.</p>	<p>Suppliers will have a contact email address for accessibility issues.</p>
<p>We're offering accessibility training to employees through a third-party provider and nationally recognised qualification.</p>	

Social value

What we do	What we ask of our supply chain
<p>At Legal & General our aim is to recognise the importance of contributing to the wellbeing of society and fostering positive social impact.</p> <p>Some examples are as follows:</p> <ul style="list-style-type: none"> • apprenticeship programmes - enable Legal & General to build a diverse talent pipeline aligned to our strategic workforce needs. Currently we have over 40 apprentices across our offices in London, Cardiff and Hove spanning data, technology, accounting, financial crime, customer service, project management and business analysis • in 2023, we launched a three-year partnership with a financial education charity whose mission is to improve financial literacy in primary school aged children • looking after our employees' wellbeing, utilising a platform focused on helping people to take care of their own mental wellbeing. It's open to anyone at Legal & General and it's totally free to use. 	<p>As part of our commitment to corporate social responsibility, we expect our suppliers to share and uphold these values.</p> <p>We encourage suppliers to actively engage with the communities in which they operate. This could involve supporting local initiatives, contributing to community development projects, or participating in philanthropic efforts that align with community needs.</p> <p>We value suppliers who actively contribute to social responsibility programmes, whether through charitable donations, volunteer initiatives, or partnerships with non-profit organisations. Suppliers are encouraged to engage in activities that positively impact society and the communities in which we live and work.</p>
<p>Ethical marketing and communication: We seek to ensure that all our marketing and communication practices are ethical, and avoid misleading advertising, respecting consumer privacy, and ensuring that their marketing efforts align with socially responsible principles.</p>	<p>Suppliers are expected to engage in ethical marketing and communication practices.</p>
<p>Measurement and reporting: Transparent reporting allows us to collectively track progress, identify areas for improvement, and celebrate successes in our shared commitment to social value creation.</p>	<p>We encourage suppliers to measure and report on their social impact initiatives regularly.</p> <p>By aligning with our expectations on social value, we expect our suppliers to contribute to a shared commitment to building a more sustainable and socially responsible business ecosystem.</p>

Prompt payment

What we do	What we ask of our supply chain
<p>The prompt payment of invoices means a more stable and sustainable economic environment which in turn enhances the resilience of the services our organisation provides.</p>	<p>We ask that suppliers sign up to the Prompt Payment Code or take positive steps to align to the ethos and ambitions of it by treating their suppliers fairly and paying invoices on time and within terms.</p>

Legal & General is a signatory of the Prompt Payment Code. While the code has a requirement to pay 95% of invoices within 60 days, Legal & General's standard payment policy is within 30 days of receipt of a valid invoice associated with a valid Purchase Order.

Real living wage

What we do	What we ask of our supply chain
<p>Legal & General Investment Management (LGIM) are members of the Platform for Living Wage Financials (PLWF), a group of 21 financial institutions who are assessing investee companies in certain key sectors to ensure workers in their supply chain, as well as within their organisations, are being paid a living wage.</p> <p>We are also a Real Living Wage Employer (and a member of the Living Wage Foundation), as such we are committed to paying our people, and those regularly contracted to us, a fair and respectable wage. This includes checks on our facilities management suppliers and increasing rates as required to ensure they meet current standards.</p>	<p>We ask that suppliers take steps to commit to the Living Wage Foundation and ensure the Real Living Wage is paid wherever feasible.</p>

June 2024